

## EXHIBIT 2

1 Scott E. Radcliffe, (CA BAR NO. 278098)  
2 **ALVES RADCLIFFE LLP**  
3 2377 Gold Meadow Way, Suite 100  
Gold River, California 95670  
T: (916) 223-3375  
E: srad@alvesradcliffe.com

4 Plaintiff  
5 on III

6

7

8 IN THE UNITED STATES DISTRICT COURT  
9 FOR THE CENTRAL DISTRICT OF CALIFORNIA

10 MAUREEN HARRINGTON, as  
11 personal representative for the estate of  
12 BLAINE HARRINGTON III,

13 Plaintiff,

14 v.

15 DEEPAK DUGAR, M.D. a MEDICAL  
16 CORPORATION,

17 Defendant.

18 Civil Action No. 2:22-cv-08230-PA-E

19

20 **PLAINTIFF'S RESPONSES TO  
DEFENDANT'S FIRST REQUEST  
FOR PRODUCTION**

21 Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure,  
22 plaintiff/counter-defendant Maureen Harrington, as personal representative of the  
23 estate of Blaine Harrington III ("Plaintiff"), submits these responses to

1       2. Documents evidencing all expenses you incurred in connection with  
2 taking the Subject Photograph.

3       **RESPONSE:** Plaintiff is not in possession, custody, or control of any  
4 documents responsive to this request.  
5

6       3. All correspondence between you and the U.S. Copyright Office  
7 concerning your application to register copyright in the Subject Photograph,  
8 inclusive of the application and any photographs or other material submitted as  
9 part of the application.  
10

11       **REPONSE:** Plaintiff is not in possession, custody, or control of any  
12 documents responsive to this request.  
13

14       4. Documents supporting your allegation that Dugar Corp. acted  
15 willfully in connection with its alleged infringement of your copyright in the  
16 Subject Photograph.  
17

18       **RESPONSE:** Documents responsive to this request are being produced  
19 contemporaneously herewith.  
20

21       5. Documents evidencing the terms of all licenses you or any person on  
22 your behalf have granted to others for use of the Subject Photograph since you  
23 created it.  
24

25       **RESPONSE:** Plaintiff is not in possession, custody, or control of  
26 documents responsive to this request.  
27

1       22. Documents evidencing your approval of any complaints filed by any  
2 attorney alleging copyright infringement of any photograph in which you claim to  
3 own copyright since January 1, 2017.  
4

5       **RESPONSE:** See response to Request No. 21.  
6

7       23. Documents evidencing your approval of the terms of settlement with  
8 any person of any claims you have asserted that such person infringed the copyright  
in any photograph you claim to own, since January 1, 2017.  
9

10      **RESPONSE:** See response to Request No. 21.  
11  
12

13 Dated: May 31, 2023.

**ALVES RADCLIFFE LLP**

14                   By: /s/ Scott E. Radcliffe  
15

16                   SCOTT E. RADCLIFFE  
17                   Attorney for Plaintiff  
18                   Blaine Harrington III  
19

**CERTIFICATE OF SERVICE**

20 I hereby certify that on May 31, 2023, I served the foregoing document via  
21 e-mail to: Vincent L. Ravine, Esq. ([vince@vravinelaw.com](mailto:vince@vravinelaw.com)) and Jeffrey L.  
22 Squires, Esq. ([jsquires@squireslegal.com](mailto:jsquires@squireslegal.com)).  
23

24                   /s/ Scott E. Radcliffe  
25                   Scott E. Radcliffe, Esq.